

Dear U.S. M.J. Sanket J. Balsara,

FILED  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ APR 10 2024 ★

I'm writing you, your honor, pertaining to Docket #: 24-cv-1113; I am enclosing along with this letter a document titled "Exhibits" that provides ~~this~~ BROOKLYN OFFICE with proof of my injuries and also appears to corroborate my fact allegations.

However in a case such as this one, there is no better evidence than the footage from the station and the officers Body worn camera showing exactly where the Plaintiff was found.

The Plaintiff believes that the MTA officers or the NYPD officers that delivered the Plaintiff to Jamaica Hospital must have reviewed the footage of the station prior to interacting with the staff at Jamaica Hospital in regards to the Plaintiff because other than that, they wouldn't know how the Plaintiff ended up on the train tracks or the platform unless they were lying?

Nevertheless, video of the incident unless it no longer exist, your honor, is going to show that officers intentionally lied to medical staff and that the Plaintiff slipped and fell on the train tracks (contrary to what officers alleged) on the day of the incident.

Furthermore, IF the defendants in this matter can't produce an audio recording of the Plaintiff admitting to jumping or a video showing he jumped upon their response to the Plaintiff's complaint; the Plaintiff will like to be appointed pro bono counsel by this court in this matter for all future proceedings associated with this matter because at that point (where they don't have no evidence supporting their defense) it is obvious certain evidence was intentionally suppressed to assist the officers in covering up their fabricated story (which is why the Plaintiff would need an attorney that has experience in challenging the credibility of people especially officers).

It's common sense, your honor, if the Plaintiff was found on the train tracks by the responding officers, there should be picture or video evidence of this and if the Plaintiff intentionally jumped onto the tracks, there should be footage depicting those events as well; IF not these defendants obviously lied to the medical staff that received the Plaintiff on the day of the incident.

I will like to remind the court that I don't know if NYPD or MTA did deal with the Plaintiff on the day of the incident. Therefore, the Plaintiff has not one clue as to what evidence exists (pertaining to this case) or doesn't. So this court should agree that if the officers (no matter what department they work for) don't have any evidence in their possession to support the claims they made on that day, it is safe to say that they fabricated the facts and the only way the Plaintiff could be afforded a fair trial at that point is to grant him pro bono assistance for the entire matter.

Additionally, the Plaintiff will provide this court with any records pertaining to the incident when he receives them.

Name: Robert DEREK LURCH JR.

Date: 4/11/2024

Signature: Robert

Docket#: 24-cv-1113

D:N#21B00L3

Case 1:20-cr-00293-WFK Document 752 Filed 04/10/24 Page 3 of 3 PageID #: 9596

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